From: Halie Butler

To: Yu, Olivia, EMNRD; Geoff Leking

Cc: Mike Bosshard

RE: Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687 Subject:

Date: Tuesday, March 6, 2018 8:58:17 AM

Attachments: image007.png

image008.png image009.png image010.png image011.png image012.png

### Good Morning Olivia-

We appreciate your quick response to our concerns. I can assure you we are all knowledgeable to follow standard sampling protocols- but being we are going to be drilling into nearly 8 ft. of compacted caliche without knowing what will be within those layers- we wanted to be sure of your expectations so we can close this out as quickly as possible. So, we will continue to follow as recommended and go from there.

Thanks.

#### **Halie Butler**

### **Corporate Compliance and Environmental Manager**

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**From:** Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

**Sent:** Tuesday, March 06, 2018 8:28 AM To: Geoff Leking <geoff@etechenv.com>

Cc: Halie Butler < HButler@selectenergyservices.com>; Mike Bosshard

<MBosshard@selectenergyservices.com>

Subject: RE: Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687

Mr. Leking:

There is no indication that delineation samples were taken from the caliche for 1RP-4662. Although

a caliche layer was encountered around 12 ft. bgs, laboratory analyses indicated permissible soil samples at least 2 ft. in depth before the caliche layer. Moreover, the delineation was completed within about 1 month of the release date, which is not the case for 1RP-4687.

Please be advised that NMOCD assumes that the environmental professional has the skills and knowledge to follow standard soil sampling protocols and collect valid samples. While other 1RPs could be used for information, each release must be characterized fully and resolved in a timely manner.

Olivia

**From:** Geoff Leking [mailto:geoff@etechenv.com]

**Sent:** Monday, March 5, 2018 4:09 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >

**Cc:** 'Halie Butler' < <u>HButler@selectenergyservices.com</u>>; <u>mbosshard@selectenergyservices.com</u>

Subject: RE: Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687

Olivia

Please correct me if I have misinterpreted the attached report. It appears that caliche samples were accepted (See Section V Work Performed pages 2 and 3). It was this report that prompted me to attempt to breach the caliche at the Billiken 7 Federal 1H site with the backhoe. Thank you.

# **Geoff Leking**

Etech Environmental & Safety Solutions, Inc. PO Box 62228

Midland, Texas 79711

Midiand, Texas 79711

Office: (432)563-2200 ext. 212

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From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

**Sent:** Monday, March 5, 2018 3:47 PM

**To:** Geoff Leking

Cc: Halie Butler; <a href="mbosshard@selectenergyservices.com">mbosshard@selectenergyservices.com</a>

Subject: RE: Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687

Mr. Leking:

To my recollection, NMOCD does not accept samples collected from the caliche, as this would not

constitute a discrete soil sample, and especially not as a rationale for not completing delineation. Furthermore, email from December 11, 2017, specifically stated that soil samples must be intact. If you were given indication otherwise, please provide source or documentation.

Is there a rationale for the continual delays in completion of delineation for 1RP-4687? The release occurred nearly 1 year ago.

Olivia

**From:** Geoff Leking [mailto:geoff@etechenv.com]

Sent: Monday, March 5, 2018 2:04 PM

**To:** Yu, Olivia, EMNRD < <u>Olivia.Yu@state.nm.us</u>>

**Cc:** Halie Butler < <u>HButler@selectenergyservices.com</u>>; <u>mbosshard@selectenergyservices.com</u>

**Subject:** Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687

Olivia

In the past, you have accepted samples collected from the caliche layer itself. Is this still true? Is there a need to obtain a sample from below the caliche if the caliche sample indicates that the chloride concentration is less than 600 mg/kg? Thank you.

# **Geoff Leking**

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To: "Geoff Leking"

Cc: "Halie Butler"; mbosshard@selectenergyservices.com

Subject: RE: Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687

**Date:** Monday, March 5, 2018 4:03:00 PM

Mr. Leking:

Such a hypothetical question can only be addressed after soil bores are drilled and properly documented. Neither soil classification nor data from other releases in this region suggest that the caliche layer is an extremely thick horizon.

Olivia

**From:** Geoff Leking [mailto:geoff@etechenv.com]

**Sent:** Monday, March 5, 2018 3:15 PM

**To:** Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

**Cc:** 'Halie Butler' <HButler@selectenergyservices.com>; mbosshard@selectenergyservices.com

**Subject:** RE: Devon/ Select Energy Billiken 7 Federal 1H - 1RP-4687

Olivia

Very good. What if no soil layer is present below the rock?

# **Geoff Leking**

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